PATENT APPLICATION
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INVENTOR(S): Shell S. Simpson.

SERIAL NO.: 10/007,254   **GROUP ART UNIT:** 2151

FILED: 10/29/2001   **EXAMINER:** Patel, Dhairya A

SUBJECT: Web-Based Imaging Service Providing the Ability to Specify a
Charge-Back Account

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U.S. PATENT AND TRADEMARK OFFICE
COMMISSIONER OF PATENTS
ALEXANDRIA, VA 22313

<u>APPELLANTS'/APPLICANTS' REPLY BRIEF</u>

The Appellant filed an opening brief on April 2, 2007. The Examiner responded
in an answer mailed July 24, 2006. The following is a reply to the Examiner's answer.

1. **GROUNDS FOR REJECTION TO BE REVIEWED.**

A.   Claims 1-16, 18-26, and 28-30 stand rejected as being unpatentable over USPN 7,013,289 issued to Horn in view of US Pub 2002/0016921 to Olsen.

2. **ARGUMENT.**

A.   Ground For Rejection A – Claims 1-16, 18-26, and 28-30 stand rejected as being unpatentable over USPN 7,013,289 issued to Horn in view of US Pub 2002/0016921 to Olsen.

Claim 1 is directed to a method of providing the ability to specify a charge-back account and, as amended, recites the following:

1.   accessing a destination service representing a production device;

2.   downloading content from said destination service into said client browser;

3.   retrieving said user's image data;

4.   selecting production options for a print job to print said user's image data using said production device; and

5.   providing said user the ability to specify a charge-back account ID for processing said print job using said production device.

In the opening brief, the Appellant explained that Horn and Olsen failed to teach or suggest (a) accessing a destination service representing a production device, (b) retrieving said user's image data, and (c) selecting production options for a print job to print such image data using the production device.

Responding in the answer at page 13, the Examiner continues to rely on Horn, asserting that col. 31, lines 21-56 teaches "selecting production options for such image data." It is initially noted that Claim 1 recites more than just the selection of production options for image data. Claim 1 recites "selecting production options for a print job to print said user's image data using said production device." Nonetheless, the Examiner states:

Horn teaches retrieving buyer's request for product (retrieving user's image data) in the WebPages, and buyer selecting a product for purchase from a drop down menu (selecting production options for

processing) according to product using the global store system (production device). Examiner equates "user's image data" as buyer's request for product i.e. the web pages displaying selected products (image data) that are for sale. Examiner has equated displaying selected products i.e. pictures from the Department website as image data because pictures of selected product is considered image data. The web page displays are rendered by buyer's web browser (user's browser).

Examiner's answer, page 13.

It appears that the Examiner is ignoring the plain language of Claim 1. The Examiner asserts that Horn teaches a "buyer selecting a product for purchase from a drop down menu (selecting production options for processing) according to product using the global store system (production device)." However, this has nothing to do with a print job printed by a production device, let alone, selecting production options for a print job to print said user's image data using said production device. Olsen is silent on this point.

Furthermore, the Appellant respectfully maintains that Horn's global store system is not a production device as recited in Claim 1. In the context of Claim 1, a production device is a device that can print a print job. The Examiner continues to mistakenly equate Horn's global store system is a production device. This is simply not true. Horn's global store system is not a production device cable of printing.

The Appellant maintains that for at least these reasons. Claim 1 is patentable over Horn and Olsen as are claims 2-18 which depend from Claim 1.

Claim 19 is directed to a destination service that is operable to:

1. represent a production device;
2. download content into a user's client browser;
3. retrieve image data associated with said user's client browser;
4. under interactive control of said user's client browser via said content, specify production options for a print job to print the image data using said production device;
5. specify a charge-back account ID for said print job;
6. direct said production device to process said print job in accordance with said selected production options;

7.   calculate the cost of said processing to be charged back; and

8.   charge back said processing to said specified charge-back account ID.

As with Claim 1, Horn mentions nothing of specifying production options for a print job to print the image data using said production device representing a production device. Horn further mentions nothing of a production device that would be capable of printing. Olsen does not address or otherwise remedy Horn's deficiencies. For at least the same reason Claim 1 is patentable over Horn and Olsen so is Claim 19 and Claims 20-27 which depend from Claim 19.

Claim 28 is directed to a system providing the ability to specify a charge-back account and, as amended, recites the following:

1.   a user's client browser operable to manage said user's production data;

2.   a destination service representing a production device, said destination service accessible from said user's client browser and operable to retrieve said user's image data, to download content into said user's browser and, under interactive control of said user's client browser, to specify production options for a print job to print said user's image data and a charge-back account ID for processing said print job using said production device.

As with Claim 1, Horn mentions nothing of destination service that specifies production options for a print job to print the image data Olsen does not address or otherwise remedy Horn's deficiencies. For at least the same reason Claim 1 is patentable over Horn and Olsen so is Claim 28 and Claims 29 and 30 which depend from Claim 28.

The Examiner Rejected Claims 17 and 27 as being unpatentable over USPN 7,013,289 issued to Horn in view of US Pub 2002/0016921 to Olsen and in further view of US Pub 2001/0042052 to Leon. Claim 17 depends from Claim 1. Claims 27 depends from Claim 19. Leon fails to address the deficiencies of Horn and Olsen. For at least the same reasons Claims 1 and 19 are patentable, so are Claims 17 and 27.

Conclusion

In view of the foregoing remarks, the applicant respectfully submits that Claims 1-30 define allowable subject matter.

Respectfully submitted,
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APPENDIX OF CLAIMS INVOLVED IN THE APPEAL

1. (previously presented) In a web based imaging environment, from a user's client browser, a method of providing the ability to specify a charge-back account, said method comprising the steps of:

accessing a destination service representing a production device;

downloading content from said destination service into said client browser;

retrieving said user's image data;

selecting production options for a print job to print said user's image data using said production device; and

providing said user the ability to specify a charge-back account ID for processing said print job using said production device.

2. (original) The method of claim 1 further comprising displaying a menu including a list of production options for processing according to said user's production data using said production device, said displayed list including a list of charge-back account IDS.

3. (original) The method of claim 2 wherein said displayed list of charge-back account IDS includes only account IDS that are individually customized to said user.

4. (original) The method of claim 1 further comprising calculating a cost breakdown for said processing according to said user's production data using said production device.

5. (original) The method of claim 4 wherein said cost breakdown is calculated prospectively during said steps of selecting and providing.

6. (original) The method of claim 5 wherein said cost breakdown is displayed dynamically during said steps of selecting and providing.

7. (original) The method of claim 5 further comprising analyzing and reporting resources required to execute said processing according to said user's production data using said production device.

8. (original) The method of claim 1 further comprising specifying a charge-back account ID.

9. (original) The method of claim 8 wherein a list of default production options associated with said specified charge-back account ID is displayed.

10. (original) The method of claim 8 further comprising:

transmitting said user's production data using said production device to said destination service;

processing according to said user's production data using said production device in accordance with said selected production options;

calculating the cost of said processing according to said user's production data to be charged back; and

charging back said processing according to said user's production data to said specified charge-back account ID.

11. (original) The method of claim 10 wherein said charging back occurs after said processing is completed.

12. (original) The method of claim 1 wherein said processing does not proceed if a chargeback account ID is not specified.

13. (original) The method of claim 1 wherein only specific production operations of said processing do not proceed if a charge-back account ID is not specified.

14. (original) The method of claim 1 wherein said user's production data comprises imaging data.

15. (original) The method of claim 14 wherein said imaging data is retrieved from said user's identity.

16. (original) The method of claim 14 wherein said imaging data is retrieved from a hard disk local to said user's client browser.

17. (original) The method of claim 1 wherein said production device comprises a printer.

18. (original) The method of claim 1 wherein said destination service is remote from said client browser.

19. (previously presented) In a web based imaging environment, a destination service operable to:

represent a production device;

download content into a user's client browser;

retrieve image data associated with said user's client browser;

under interactive control of said user's client browser via said content, specify production options for a print job to print the image data using said production device;

specify a charge-back account ID for said print job;

direct said production device to process said print job in accordance with said selected production options;

calculate the cost of said processing to be charged back; and

charge back said processing to said specified charge-back account ID.

20. (original) The destination service of claim 19 further operable to display at said client browser via said downloaded content a menu including a selection of production options and charge-back account IDS associated with said production device.

21. (original) The destination service of claim 20 wherein said displayed list includes only account IDS that are individually customized to said user.

22. (original) The destination service of claim 19 further operable to calculate a cost breakdown estimate prior to directing said production device to process in accordance with said selected production options.

23. (original) The destination service of claim 22 further operable to display said cost breakdown dynamically.

24. (original) The destination service of claim 19 operable to retrieve said production data from said user's identity.

25. (original) The destination service of claim 19 operable to retrieve said production data from a hard disk local to said user's client browser.

26. (original) The destination service of claim 19 wherein said production data comprises imaging data.

27. (original) The destination service of claim 19 wherein said production device comprises a printer.

28. (previously presented) In a web based imaging environment, a system providing the ability to specify a charge-back account, said system comprising:

a user's client browser operable to manage said user's production data;

a destination service representing a production device, said destination service accessible from said user's client browser and operable to retrieve said user's image data, to download content into said user's browser and, under interactive control of said user's client browser, to specify production options for a print job to print said user's image data and a charge-back account ID for processing said print job using said production device.

29. (original) The system of claim 28 wherein said destination service is further operable to display at said user's client browser via said downloaded content a list of said production options and charge-back accounts.

30. (original) The system of claim 28 wherein said destination service is further operable to calculate and display dynamically a cost breakdown estimate to process using said production device according to said user's production data and according to said specified production options.